

### REMARKS

Claims 1 - 12 are pending in the present application. Reconsideration of the application is respectfully requested.

In section 2 of the Office Action, claims 1, 2, 7 and 12 are objected to because of informalities. Applicants are amending claims 1, 2, 7 and 12 to address the informalities. A withdrawal of the objection is respectfully solicited.

In section 4 of the Office Action, claim 1 is rejected under 35 U.S.C. 112, second paragraph as being indefinite. Applicants are amending claim 1 as suggested by the Examiner. A withdrawal of the section 112 rejection is respectfully requested.

In section 7 of the Office Action, claim 12 is rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent Application Publication No. 2002/0087647 to Quine et al. (hereinafter "the Quine et al. publication"). As mentioned above, Applicants are amending claim 12 to address an informality. Applicants are also making a minor amendment to introduce a term. However, with regard to the substance of claim 12, Applicants are traversing this rejection.

Claim 12 provides for a system for determining an email address. The system includes, *inter alia*, means for testing the multiplicity of the target recipient's possible email addresses until a valid address is found.

The Quine et al. publication is directed toward a system that provides email address correction and email forwarding (Abstract). FIG. 6 is a flowchart for the email forwarding and email address correction system (paragraph 0024). In step 600, an undeliverable address is submitted to the system (paragraph 0071, lines 3 – 4). As is apparent from FIG. 6, a processing of the undeliverable address can yield several possible results.

- (1) In step 620, the system checks to see whether the undeliverable address is registered as having a corresponding forwarding address. If there is a forwarding address, then in step 622, the message is simply forwarded to the forwarding address (paragraph 0073).
- (2) In step 630, the e-mail address is compared to registered e-mail addresses to determine whether there is a close match (paragraph 0074, lines 1 – 5). If there is a close match, then in step 632, the sender, i.e., the sender of the email to the undeliverable address, is notified. (paragraph 0074, lines 5 – 6)).
- (3) In step 650, if an address correction routine generated a suggested correction, then in step 652, the suggested correction is transmitted to the original sender, i.e., the sender of the email to the undeliverable address. (paragraph 0075, lines 4 – 7)
- (4) In step 660, if none of the techniques employed by the system is successful in providing a forwarding address or a suggested correction, then a message is transmitted to the originator, i.e., the sender of the email to the undeliverable address. (paragraph 0075, lines 7 – 10).

The Office Action, on page 5, indicates that the Quine et al. publication, in a passage at paragraph 0047, lines 7 – 10, discloses means for testing the multiplicity of the target recipient's possible email addresses until a valid address is found. Applicants respectfully disagree.

The Quine et al. publication, at paragraph 0047, lines 7 – 10, states:

In one embodiment, the address correction routine may be part of an e-mail forwarding service and the message may have been previously found to be undeliverable.

Thus, the passage at paragraph 0047, lines 7 – 10 merely indicates that the e-mail forwarding service may act upon a message that may have been previously found to be undeliverable. This passage does not mention testing an email address, much less testing a multiplicity of possible email addresses.

Moreover, although the Quine et al. publication mentions that a message may have been previously found to be undeliverable, the flowchart of FIG. 6 does not indicate that the system has any capability of testing a suggested correction, and instead, as mentioned above, according to the flowchart of FIG. 6, in step 652, transmits the suggested correction to the originator. Thus, the Quine et al. does not disclose means for **testing the multiplicity of the target recipient's possible email addresses** until a valid address is found, as recited in claim 12. Accordingly, Applicants submit that the Quine et al. publication does not anticipate claim 12.

In section 10 of the Office Action, claim 1 is rejected under 35 U.S.C. 103(a) as being unpatentable over the Quine et al. publication, in view of U.S. Patent Application Publication No. 2002/0013817 to Collins et al. (hereinafter "the Collins et al. publication"), and further in view of an article entitled "Setting up Catch All Email" (hereinafter "Setting up Catch All Email"). Applicants are clarifying an aspect of claim 1 that is not disclosed by this cited combination of references.

Claim 1 provides for a computerized method for determining a desired recipient's email address. The method includes, *inter alia*:

- f. sending a probe email addressed to a known invalid email address;
- g. monitoring a response of a target recipient email server for a unique server address to determine if a bounce to the sending of the probe email occurs; and
- h. recording that the email address cannot be found if no bounce to the sending of the probe email occurs.

The method also includes:

- m. repeating i, j and l using the plurality of first target recipient's guessed email addresses in succession until j occurs or there are no other first recipient's guessed email addresses.

The Office Action, on page 8, notes that the combination of the Quine et al. publication and the Collins et al. publication does not disclose f. sending a probe email addressed to a known invalid email address; and h. recording that the email address cannot be found if no bounce to the sending of the probe email occurs. Accordingly, the Office Action suggests that Setting up Catch All Mail discloses these features. Applicants respectfully disagree.

Setting up Catch All Email is directed to a feature of a system that employs a default email address to “catch all mail” that is addressed to a particular domain (page 1, lines 1 – 4). The “catch all mail” feature is apparently employed by an administrator of a system that receives the email so that all incoming mail will be directed to a “default” email account, and as such, the system will receive everything sent to the domain (page 1, lines 5 – 10). Setting up Catch All Email does not describe a treatment of an invalid email address by a sender of the email. Moreover, when the “catch all mail” feature is employed, since all email is directed to the “catch all mail” default mailbox, the system will not respond with a bounce, even if the email is invalid, and therefore, will also not record that the email address cannot be found.

Whereas Setting up Catch All Email does not describe a treatment of an invalid email address by a sender of the email, it does not describe **sending a probe email** addressed to a known invalid email address, as recited in claim 1.

Additionally, whereas in Setting up Catch All Email, when the “catch all mail” feature is employed, the system will not respond with a bounce, even if the email is invalid, and therefore, will also not record that the email address cannot be found, Setting up Catch All Email does not disclose, **recording that the email address cannot be found if no bounce** to the sending of the probe email occurs, as recited in claim 1.

Whereas Setting up Catch All Email does not disclose the above-emboldened features of claim 1, the cited combination of the Quine et al. publication, the Collins et al. publication, and Setting up Catch All Email does not describe these features of claim 1.

Also, the Office Action, on page 6, indicates that the Quine et al. publication, paragraph 0047, lines 7 – 10, discloses repeating i, j and l using the first target recipient's guessed email addresses in succession. However, as explained above, during the discussion of claim 12, the passage at paragraph 0047, lines 7 – 10 merely indicates that the e-mail forwarding service may act upon a message that may have been previously found to be undeliverable. This passage does not mention testing an email address or that the system has any capability of testing a suggested correction. Instead, according to the flowchart of FIG. 6, in step 652, the system transmits the suggested correction to the originator. Therefore, the system in the Quine et al publication does not appear to have any knowledge of whether the suggested correction is valid. Thus, the cited combination of references also fails to disclose repeating i, j and l using the plurality of first target recipient's guessed email addresses **in succession until j occurs or there are no other first recipient's guessed email addresses**, as recited in claim 1.

Applicants submit that for the several reasons provided above, claim 1 is patentable over the cited combination of the Quine et al. publication, the Collins et al. publication and Setting up Catch All Email.

Applicants are requesting reconsideration and a withdrawal of the section 103(a) rejection of claim 1.

In section 12 of the Office Action, claims 2 – 11 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Quine et al. publication in view of U.S. Patent No. 7,203,706 to Jain et al. (hereinafter "the Jain et al. patent"). Claims 2 and 7 are independent claims. As mentioned above, Applicants are amending claims 2 and 7 to address informalities. Applicants are also amending claims 2 and 7 to make a minor clarification and to properly introduce some terms. However, with regard to the substance of the claims, Applicants are traversing this rejection.

Claim 2 provides for a system to send email to target recipients with known email server addresses and with unknown email addresses. The system includes, (c) an email address identifier send server ... to guess a multiplicity of the target recipient's possible email addresses, to send email to the guessed email addresses sequentially as requested, and to determine if all guessed email addresses have

been sent an email, and (d) an email address identifier read server ... to request the email address identifier send server send the next guessed email address an email upon receipt of a bounce message.

The Office Action on pages 10 and 11, indicates that the Quine et al. publication discloses all of the above-noted features of claim 2. Applicants respectfully disagree.

In the Quine et al. publication, as explained above, during the discussion of claim 12, the passage at paragraph 0047, lines 7 – 10 merely indicates that the e-mail forwarding service may act upon a message that may have been previously found to be undeliverable. This passage does not mention testing an email address or that the system has any capability of testing a suggested correction. Instead, according to the flowchart of FIG. 6, in step 652, the system transmits the suggested correction to the originator. Thus, the Quine et al. publication does not disclose (c) an email address identifier send server ... to guess a multiplicity of the target recipient's possible email addresses, to send email to the guessed email addresses sequentially as requested, and **to determine if all guessed email addresses have been sent an email**, and (d) an email address identifier read server ... **to request the email address identifier send server send the next guessed email address an email** upon receipt of a bounce message, as recited in claim 2.

The Jain et al. patent does not make up for this deficiency on the part of the Quine et al. publication. Accordingly, claim 2 is patentable over the cited combination of the Quine et al. publication and the Jain et al. patent.

Claims 3 – 6 depend from claim 2. By virtue of this dependence, claims 3 – 6 are also patentable over the cited combination of the Quine et al. publication and the Jain et al. patent.

Claim 7 provides for a system to send email to target recipients with unknown email addresses and known data items and email server address. The system includes (e) an email address identifier read server programmed to ... determine if a particular guessed email address has been sent an email by an email address identifier send server, ... request the email address identifier send server send the next guessed email address an email upon receipt of a bounce message, and identify the email address could

not be found on the database server if all guessed email address have been sent an email by the email address identifier send server.

The Office Action on pages 14 and 15, indicates that the Quine et al. publication discloses all of the above-noted features of claim 7. Applicants respectfully disagree.

The Quine et al. publication, as explained above during the discussion of claim 12, does not mention testing an email address or that the system has any capability of testing a suggested correction. Instead, according to the flowchart of FIG. 6, in step 652, the system transmits the suggested correction to the originator. Thus, the Quine et al. publication does not disclose (e) an email address identifier read server programmed to ... **determine if a particular guessed email address has been sent** an email by an email address identifier send server, ... **request the email address identifier send server send the next guessed email address an email** upon receipt of a bounce message, and identify the email address could not be found on the database server **if all guessed email address have been sent an email** by the email address identifier send server, as recited in claim 7.

The Jain et al. patent does not make up for this deficiency on the part of the Quine et al. publication. Accordingly, claim 7 is patentable over the cited combination of the Quine et al. publication and the Jain et al. patent.

Claims 8 – 11 depend from claim 7. By virtue of this dependence, claims 8 – 11 are also patentable over the cited combination of the Quine et al. publication and the Jain et al. patent.

Applicants are requesting reconsideration and a withdrawal of the section 103(a) rejection of claims 2 – 11.

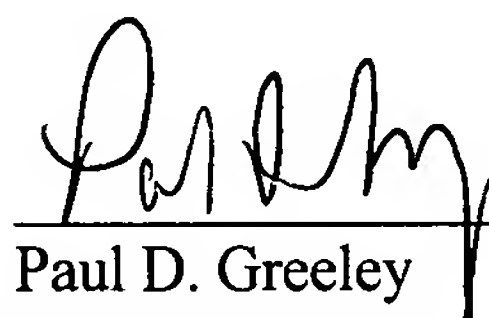
As mentioned above, Applicants are (a) amending claims 1, 2, 7 and 12 to address some informalities, (b) amending claim 1 to address a section 112 rejection, (c) amending claim 12 to introduce a term, (d) clarifying an aspect of claim 1 that is not disclosed by the cited combination of references, and (e) amending claims 2 and 7 to make a minor clarification and to properly introduce some terms.

In view of the foregoing, Applicants respectfully submit that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

Respectfully submitted,

Date

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Paul D. Greeley

Reg. No. 31,019

Attorney for the Applicants

Ohlandt, Greeley, Ruggiero & Perle, L.L.P.

One Landmark Square, 10<sup>th</sup> Floor

Stamford, CT 06901-2682

Tel: 203-327-4500

Fax: 203-327-6401